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**Date:** 7/16/04 2:43PM  
**Subject:** Response to Proposed Testing Procedures

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1500 West Third Street  
williamsport, PA 17701  
Docket Number 04-7984

To Whom It May concern:

I do not believe the proposed drug testing procedures complement the current procedure. Someone once said "If it ain't broke don't fix it!" Inclusions of these to thwart adulteration, substitution and dilution seems well meaning but each procedure has a phase of testing that it would not be applicable and limits for detection of some drug classes as stated in the FTA Update from Spring 2004. Urine drug is the most versatile. Vigilance during collection, established procedures and screening during the analysis should be effective and sufficient. I prefer the collection and processing of the COC's to be handled at the collection site to keep any of this process out of administration's hands and is preferred by the collective bargaining unit.

Yours truly,  
John Kiehl, Jr.